

ELLIS:LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhome.com

March 22, 2007

FILED ELECTRONICALLY AND BY FIRST-CLASS MAIL SERVICE

The Honorable Charles L.A. Terreni
Executive Director
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

RE: dPi Teleconnect, LLC, Complainant/Petitioner
v. BellSouth Telecommunications, Inc., Defendant/Respondent
Docket No. 2005-358-C, Our File No. 536-11404

Dear Mr. Terreni:

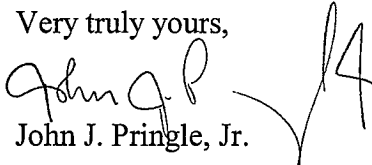
Enclosed please the original and one copy of the **Motion to Compel and Motion for Continuance** for filing on behalf of dPi Teleconnect, LLC in the above-referenced docket.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,


John J. Pringle, Jr.

cc: Nanette Edwards, Esquire
Christopher Malish, Esquire
Mr. Brian Bolinger
all parties of record

Enclosures

THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2005-358-C

In Re:)	
)	dPi's Motion for Continuance
dPi Teleconnect, L.L.C. v.)	
BellSouth Telecommunications, Inc.)	

dPi Teleconnect, L.L.C. ("dPi"), Complainant in the above Docket, moves the South Carolina Public Service Commission to continue the proceedings in this Docket until Defendant BellSouth Telecommunications, Inc. ("BellSouth") responds to requested discovery.

BACKGROUND

dPi files contemporaneously with this motion a motion to compel responses to discovery. This case turns on improper denial of credits. Pursuant to federal law, BellSouth must provide service to resellers, such as dPi, at the same rate at which it provides its own end users. This includes promotional credits.

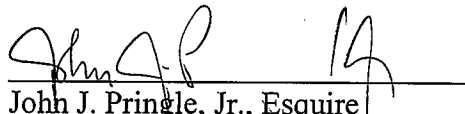
dPi requested certain promotional credits. BellSouth denied some without disclosing the reasons. Fundamental in determining whether and the value credits were improperly denied are: (1) how much were BellSouth's customers charged for the same services dPi requested; (2) the reasons dPi was denied credits; and (3) the amount of credits denied for each reason of denial. dPi has no way of knowing why any credit was denied, or how much credit was denied for each particular basis for denial. BellSouth has refused to provide this information pursuant to proper discovery requests. Without this information – all of which is in BellSouth's possession – dPi cannot present its case.

The schedule in this Docket order requires dPi to file its prefled testimony on March 28,

2007. dPi agreed to the scheduling in this cause on the assumption that there would be no discovery issues. dPi had been involved with litigation against BellSouth in North Carolina Docket No. P-55, Sub 1577, and has made similar discovery requests in both cases. BellSouth complied in North Carolina. Surprisingly, dPi makes the same requests in South Carolina – all fundamental to dPi's cause – and they are being refused on various grounds. dPi cannot file its prefiled testimony without BellSouth's responses to discovery requests and is left with the no option but to seek a continuance until BellSouth has responded.

Wherefore, dPi requests that the Commission continue the proceedings in this Docket until a reasonable time after the discovery dispute is settled.

Respectfully submitted,



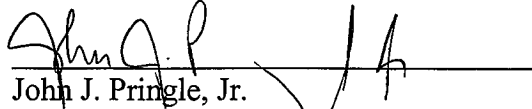
John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
1501 Main Street, 5th Floor
P.O. Box 2285
Columbia, South Carolina 29202
Telephone: (803) 779-0066
Facsimile: (803) 799-8479

Attorney for dPi Teleconnect, L.L.C.

Columbia, South Carolina
March 22, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above instrument was transmitted to parties of record via electronic mail and first-class mail service on March 22, 2007.


John J. Pringle, Jr.

Patrick W. Turner, General Counsel - South Carolina
BellSouth Telecommunications, Inc.
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201

Andrew Shore, Sr. Regul. Counsel
BellSouth Telecommunications, Inc.
675 West Peachtree, Suite 4300
Atlanta, Georgia 30375

Nannette Edwards, Esquire
Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211